

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

THE GEO GROUP, INC.,)	
)	
Plaintiff,)	
)	
v.)	Case No. CIV-23-1014-G
)	
HINTON ECONOMIC)	Judge Charles B. Goodwin
DEVELOPMENT AUTHORITY, a)	
Public Trust, and THE TOWN OF)	
HINTON, OKLAHOMA,)	
)	
Defendants.)	

MOTION TO EXTEND RESPONSIVE MOTION DEADLINE

COMES NOW the Plaintiff, The GEO Group, Inc. and respectfully moves the Court to extend the deadline to respond to Motions for Summary Judgment (Docs. 27 and 28), by fourteen (14) additional days, from November 1, 2024, to November 15, 2024. In support thereof, The GEO Group, Inc. shows the Court as follows:

1. This is a dispute over the extent of the contractual obligations, if any, between the Plaintiff, The GEO Group, Inc. and the Defendants, Hinton Economic Development Authority (“HEDA”) and the Town of Hinton, Oklahoma. (See Doc. 1 & Doc. 7.)
2. Plaintiff filed this Complaint on November 21, 2023. (See Doc. 1.)
3. Defendants filed their Answer and Counterclaims on December 8, 2023. (See Doc. 7.)

4. The Parties both filed Motions for Summary Judgment on October 11, 2024. (See Docs. 27 & 28.)

5. Plaintiff's counsel has multiple motions for summary judgment due on November 4, 2024, in a complex civil rights case filed in the Eastern District.

6. Due to these conflicting deadlines, the current response deadline is unachievable.

7. For these reasons, the current dispositive motion deadline is unachievable.

8. Accordingly, the Parties request that the Court extend the deadline for Plaintiff and Defendants to respond to each other's Motion for Summary Judgment by fourteen days, from November 1, 2024 to November 15, 2024, in order to allow the Parties time to draft their Responses. Given counsels' current schedules, the parties believe fourteen days is sufficient time to complete the Responses.

9. Defense counsel does not object to this Motion.

10. This is the first Motion to Extend the Response Deadline since the Motions for Summary Judgment were filed. (See Docs. 27 & 28.) The parties only seek to extend the Response deadline, and do not wish to modify any other current deadlines. The parties believe that this extension will not interfere with the other scheduled deadlines in the case. This request is not being made for purposes of undue delay, evasion or unfair advantage. Neither the Court nor the Parties will be prejudiced by this delay.

11. A proposed Order is being submitted with this Motion.

WHEREFORE, premises considered, all Parties, by and through their respective counsel, respectfully move for an Order from this Court extending the deadline for all parties to respond to Motions for Summary Judgment by fourteen (14) days from November 1, 2024, to November 15, 2024, as requested herein.

Respectfully submitted,

s/ Randall J. Wood
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Group, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this **October 16, 2024**, I electronically transmitted the attached document to the Clerk of Court via the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to all parties who have filed an Entry of Appearance in this matter.

s/ Randall J. Wood
Randall J. Wood